

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**JOAO BOCK TRANSACTION
SYSTEMS OF TEXAS, LLC,**

Plaintiff,

VS.

AT&T, INC., agent of AT&T, INC., et al.

Defendants.

**CIVIL ACTION NO.
6:09-cv-208-LED**

JURY TRIAL DEMANDED

JOAO BOCK TRANSACTION SYSTEMS OF TEXAS, LLC'S NOTICE OF PROPOSAL
FOR ECONOMICAL AND EFFICIENT TRIAL AND TRIAL PREPARATION

Joao Bock Transaction Systems of Texas LLC (“JBTS”) submits the following proposals for economical and efficient trial and trial preparation. JBTS continues to work with Defendants regarding procedures and stipulations related to discovery and pre-trial matters that will be addressed in Docket Control and Discovery Orders to be submitted by the parties on April 29, 2010. JBTS has attached as “Exhibit A” portions of an agreed discovery order for consideration by the Court.

JBTS requests the Court adopt the following recommendations to promote efficiency in pre-trial and trial related matters:

- JBTS recommends that the Court limit the number of terms to be construed by the Court to ten (10) terms absent a showing of good cause.
- JBTS recommends that the Court require the Plaintiff to limit the number of asserted claims to 10 claims per Defendant within fourteen (14) days after the issuance of a *Markman* Order by the Court.

- JBTS recommends that the Court bifurcate validity and infringement issues from liability and damages issues at trial. JBTS recommends that validity and infringement of the patent-in-suit be tried first. If the Defendants are found to infringe the asserted patent, and the patent is found to be valid, then a separate trial on damages and liability shall be had.

JBTS respectfully submits that the Court adopt these procedures and further set discovery and docket control issues as recommended in the parties proposed Document and Docket Control Orders.

Dated: April 26, 2010

Respectfully submitted,

/s/ Andrew W. Spangler
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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of April, 2010 electronically transmitted a pdf version of this document to the Clerk of Court using the CM/ECF system for filing and for transmittal of a Notice of Electronic Filing to all attorneys of record.

/s/ Andrew W. Spangler
Andrew W. Spangler